

**Thomas & Solomon LLP**  
THE EMPLOYMENT ATTORNEYS

April 17, 2023

**VIA ECF**

Hon. David N. Hurd  
United States District Judge  
Federal Building and U.S. Courthouse  
Utica, New York 13501

Re: Carollo, et al. v. United Capital Corp., et al.  
Civil Action No. 16-cv-0013 (DNH)(TWD)

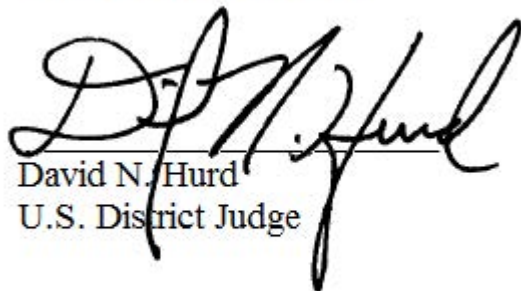
Dear Judge Hurd:

Pursuant to Magistrate Judge Dancks' Orders dated February 16, 2023 and April 17, 2023, I write on behalf of both parties in the above-referenced action to provide a status update regarding settlement. Dkt. Nos. 179, 181.

As the Court is aware, on February 15, 2023, the Parties participated in a mediation and reached an agreement in principle. Since that time, the Parties have exchanged drafts of the settlement agreement and corresponding exhibits. The Parties are now in the process of finalizing the settlement agreement and gathering signatures. Thus, the Parties respectfully request that the Court extend the deadline for the submission of the motion for preliminary approval until on or before May 1, 2023.

If this request meets with Your Honor's approval, a "So Ordered" line is provided below for your convenience. Thank you for your courtesies in this matter. If the Court has any questions, please do not hesitate to contact our office.

IT IS SO ORDERED:



David N. Hurd  
U.S. District Judge

Respectfully submitted,

/s/ Jessica L. Lukasiewicz

Jessica L. Lukasiewicz

Dated: 04-18-2023